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7 Attorney for Arlandell Moore

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**  
10

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 ARLANDELL MOORE,  
15 Defendant.  
16

Case No. 2:18-cr-383-APG-EJY

**STIPULATION TO CONTINUE  
PRETRIAL MOTION DEADLINES**  
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.  
18 Trutanich, United States Attorney, and Linda Mott, Assistant United States Attorney, counsel  
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and  
20 Monique Kirtley, Assistant Federal Public Defender, counsel for Arlandell Moore, that the  
21 previously ordered deadline for filing of pretrial motions be vacated and that the parties herein  
22 shall have to and including November 22, 2019, within which to file the Defendant's pretrial  
23 motions currently due October 23, 2019.

24 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
25 shall have to and including December 6, 2019, to file any and all responsive pleadings, currently  
26 due November 6, 2019.

1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
2 shall have to and including December 13, 2019, to file any and all replies to dispositive motions,  
3 currently due November 13, 2019.

4 The Stipulation is entered into for the following reasons:

5 1. Counsel for the defendant needs additional time to complete necessary research  
6 regarding a possible pretrial motion and time to discuss the results of the research with her  
7 client.

8 2. The defendant is not incarcerated and does not object to the continuance.

9 3. The parties agree to the continuance.

10 4. The additional time requested herein is not sought for purposes of delay, but  
11 merely to allow counsel for defendant sufficient time within which to discuss the proposed  
12 resolution with her client.

13 5. Additionally, denial of this request for continuance could result in a miscarriage  
14 of justice.

15 This is the first stipulation to continue filed herein.

16 DATED this 24<sup>th</sup> day of October, 2019.

17 RENE L. VALLADARES  
18 Federal Public Defender

NICHOLAS A. TRUTANICH  
United States Attorney

19 /s/ Monique Kirtley  
20 By \_\_\_\_\_  
21 MONIQUE KIRTLEY  
Assistant Federal Public Defender

/s/ Linda Mott.  
By \_\_\_\_\_  
LINDA MOTT  
Assistant United States Attorney

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**ORDER**

IT IS THEREFORE ORDERED that the parties herein shall have to and including November 22, 2019, within which to file the Defendant's pretrial motions.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including December 6, 2019 to file any and all responsive pleadings.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including December 13, 2019 to file any and all replies to dispositive motions.

DATED this 24th day of October, 2019.



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UNITED STATES DISTRICT JUDGE